

June 27, 2025

VIA ECF

 Hon. Victoria Reznik, U.S.M.J.
 United States District Court
 300 Quarropas Street, Courtroom 420
 White Plains, NY 10601

Re: *The Wave Studio, LLC v. General Hotel Management Ltd. et al.*
Case No. 7:13-cv-09239-CS-VR

Dear Magistrate Judge Reznik:

Pursuant to the Court's June 20, 2025 Order (ECF Dkt. 529), we write on behalf of Defendants SIGNATURE TRAVEL NETWORK COOPERATIVE, INC. ("**SIGNATURE**"), FROSCH INTERNATIONAL TRAVEL, INC. ("**FROSCH**") and TZELL TRAVEL, LLC ("**TZELL**")¹ (collectively the "**SIGNATURE DEFENDANTS**") in response to Plaintiff's June 18, 2025 letter (ECF Dkt. 528).

1. Plaintiff's Request For Status Conference

The SIGNATURE DEFENDANTS believe that it would be more productive to schedule a status conference after the pending motions to dismiss are decided by the Court.

2. The Master Complaint

The SIGNATURE DEFENDANTS respectfully submit that the "Master Complaint" filed January 26, 2024 (ECF Dkt. 332) is the operative pleading for at least the reasons set forth in the Booking Holdings Defendants' June 27, 2025 letter filed with the Court (ECF Dkt. 553).

3. Termination of General Hotel Management Ltd.

The SIGNATURE DEFENDANTS believe it is unnecessary and counter-productive to terminate Defendant General Hotel Management Ltd. ("**GHM**") from the docket. The SIGNATURE DEFENDANTS (like other defendants) have claimed indemnification from GHM and anticipate filing a cross claim against GHM. Terminating GHM will not only remove it from participating in settlement discussions with Plaintiff, but will be short-lived when GHM is brought back into the case by third party complaint.

4. Confirmation of Counsel of Record

The SIGNATURE DEFENDANTS confirm that they are jointly represented in this action by Kenneth S. Weitzman and Richard Straussman of Weitzman Law Offices, LLC, both of whom are correctly identified on the docket.

¹ TZELL was identified in the original and first amended complaints as "Vacations by Tzell d/b/a Vacationsbytzell.com."



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5. Settlement

The SIGNATURE DEFENDANTS remain open to discussing settlement.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "KSW", with a stylized flourish at the end.

Kenneth S. Weitzman

cc: All counsel of record (via ECF)